SUPERFUND PRELIMINARY CLOSEOUT REPORT
FINAL REMEDIAL ACTION
FOR
FORD ROAD INDUSTRIAL LANDFILL
ELYRIA, OHIO

I. INTRODUCTION

This Preliminary Closeout Report documents the completion of construction activities for the Ford Road Industrial Landfill (Ford Road) Superfund Site (the site) in accordance with the U.S. Environmental Protection Agency's (EPA) OSWER Directive 9320.2-22. Ford Road is not currently on the National Priorities List (NPL) but is being addressed under the Superfund Alternative Approach. The remedial action (RA) at the site was conducted by the potentially responsible parties (PRPs) pursuant to a Consent Decree (CD) between EPA, Chevron Environmental Management Company, General Motors Corporation, Goodrich Corporation, Browning-Ferris Industries of Ohio, Ford Motor Company, and the Lorain County Metropolitan Parks District (MetroParks).

A pre-final inspection was conducted by EPA, assisted by the Ohio Environmental Protection Agency (OEPA) and attended by some members of the Ford Road Responsible Party Group (Ford Road RP Group) on December 4, 2012, to ensure that the remedy was constructed in accordance with the approved remedial design (RD) plans and specifications required under the CD. As required under the CD, RA construction activities completed at the site included the following: construction of the final cap system; construction of the Steep Slope Area soil buttress; seeding; placement of Green Armor erosion control; construction of the sedimentation basin, drivable drainage channel, and access roads; removal of two localized hot-spot areas; and extension of a riprap face to the Black River bank.

EPA is the lead enforcement agency at this site. The inspection verified that the Ford Road RP Group performed the activities necessary to achieve site construction completion. All construction was performed in accordance with approved RD plans and specifications, pursuant to the CD. All construction activities were completed on-site. However, substantial storm events in late 2012 damaged the newly-completed cap and will require some minor repairs. This damage to the cap does not affect the construction completion determination, and these repairs will be completed prior to the approval of the RA Construction Completion Report. Institutional controls (ICs) in the form of environmental restrictive covenants are under development using guidelines developed by OEPA and EPA.

II. SUMMARY OF SITE CONDITIONS

The Ford Road Landfill is a 15-acre inactive facility located in Elyria, Lorain County, Ohio. Landfilling activities are believed to have begun with the placing of local municipal waste into the ravine extending east from Ford Road in the early 1900s. Various owners, including Browning Ferris Industries, operated the landfill for various periods in the 1960s and early 1970s where municipal and various industrial wastes in drums and in bulk were accepted. Landfill

operations ended in 1974, but the landfill was not closed under EPA guidelines. The current owner of the site is the Lorain County Metropolitan Parks District (MetroParks).

The site is located on the northern edge of Elyria on Ford Road, about 1.5 miles from Interchange 8 of the Ohio Turnpike, Interstate 90. The site is not fenced and is accessible from all sides. Several residences are located within one mile of the site with the nearest being about 200 feet northwest of the site. The site is bordered by an intermittent stream and a sewer main that is covered with riprap to the north, a ravine and rural land to the south, the Black River to the east, and Ford Road and the Black River Preserve to the west. Site topography is characterized by the gently sloping top surface of the landfill which descends from an elevation of approximately 690 feet above mean sea level (amsl) at the western boundary of the site along Ford Road to an elevation of approximately 680 feet amsl at the top of the slope around the northern, eastern, and southern edge of the landfill surface. The northern, eastern, and southern flanks of the landfill slope steeply down to the 100-year flood plain of the Black River at an elevation of approximately 610.9 feet amsl. A swale, oriented approximately north-south, was constructed along the western edge of the landfill. The swale directs runoff into a stormwater drain that discharges into the intermittent stream which is a crushed-stone-filled drainage feature that extends from Ford Road to the Black River immediately north of the site.

Past investigations at the Ford Road Landfill appear to have begun in the early 1970s. During a 1980 site inspection, EPA observed leachate entering the Black River at the northeastern corner of the site. Analytical results showed elevated concentrations of various contaminants, including polychlorinated biphenyls (PCBs). The MetroParks and Browning-Ferris of Ohio implemented a voluntary response action involving the addition and grading of cover soil to intercept and contain reported observations of leachate emanating from the site.

In 2001, the Ohio Department of Public Health conducted a health assessment and concluded that additional environmental investigations of the site were needed to better characterize the levels of hazardous waste in the landfill and the extent of impact on the surrounding environment. In July 2002, an EPA Administrative Order of Consent (AOC) was signed by Browning-Ferris Industries of Ohio, PolyOne Corporation, Goodrich Corporation, Ford Motor Company, General Motors Corporation, Chevron Environmental Management Company and Kewanee Industries Incorporated to perform a Remedial Investigation/Feasibility Study (RI/FS) at the site following the CERCLA process.

On September 27, 2006, EPA signed a Record of Decision (ROD) for the site. The selected remedy included two main components: In-Situ Containment and Landfill Cover Enhancement, and Hot Spot Removal. These components included the following actions: removal of wastes on the side slopes and re-grading to improve surface water control over the extent of the landfill; placement of additional low-permeability material over those areas of the landfill lacking sufficient cover material; stabilization of the landfill; and removal of a select soil hotspot located just outside the landfill limits in the northeastern corner of the site. EPA and the RP Group entered into a CD on February 8, 2009, under which the RP Group agreed to perform the RD and RA at the site.

The Remedial Action Objectives (RAOs) identified in the ROD are listed below:

- Minimize the potential for direct contact exposures of human and ecological receptors to contaminants of concern in site soils;
- Reduce potential risks to human health and the environment associated with site soils, sediment, groundwater, and surface water; and
- Reduce the possibility for contaminant transport and/or migration.

These RAOs were achieved by the implementation of the two main remedy components selected in the ROD – Hot Spot Removal and In-Situ Containment and Landfill Cover Enhancement.

The construction activities at the site occurred in two phases. Phase I of the project took place in December 2011 and included the following:

- Site clearing of trees and brush and roadway construction;
- Barrier wall (slurry wall) constructed between the landfill and the excavation to prevent water flow into the excavation;
- Removal of PCB-contaminated soil at the northern point that had gross contamination (visible product, photoionization detector (PID) readings above 50 parts per million (ppm) and/or strong hydrocarbon odor and stained soils), and stockpiling of those soils on-site for analysis;
- Removal of VOC-contaminated soil at the southern point that had PID readings above action levels, and stockpiling of those soils on-site for analysis;
- A total of 3,013 cubic yards of soil was excavated and stockpiled;
- Analysis of stockpiled soil showed the soil did not exhibit hazardous characteristics and did not require off-site disposal, so the soil was staged and covered over the winter;
- Placement of rip rap along the Black River to prevent erosion; and
- Replanting the area where soils had been removed.

Phase 2 of the project involved the bulk of the actual landfill re-grading and stabilization. This work started at the end of May 2012 and was largely completed in November 2012. The following activities occurred as part of Phase 2 of the project:

- Building the access roads around the landfill;
- Constructing the sedimentation basin;
- Addition of rip-rap along the Black River;
- Construction of the landfill buttress;
- Grading of the landfill and capping;
- Seeding of the landfill; and
- Road repairs along Ford Road.

The implementation of long-term institutional controls is underway and is expected to be completed in 2013. The goal of these ICs is to prevent direct contact exposure with the residual contamination within the landfill. Therefore, digging or disturbance of the cover (or underlying contaminated material) will be prevented (or if needed, repairs will be made). The ICs will also restrict groundwater use to help ensure protectiveness of human health. These will include

restrictions on drinking water well installation and consumption of groundwater from the site. There will be an operation, monitoring and maintenance program at the site that will require routine inspection of the landfill cover and the implementation of any necessary repairs.

III. DEMONSTRATION OF CONSTRUCTION QUALITY ASSURANCE/QUALITY CONTROL

Based upon the pre-final inspection that occurred on December 4, 2012, the Agencies and RP Group agreed that the main construction components of the selected remedy have been completed. The construction activities at the site were consistent with the ROD, the Scope of Work in the CD, and the approved RD plans and specifications. No significant deviations occurred during the construction that differed from the approved design plans. Due to the storm events that damaged the newly-constructed cap, a punch list of items was identified during the pre-final inspection. Completion of the punch list items will finish the work in accordance with the design plans. EPA anticipates that the RA Construction Completion Report will be approved upon completion of the punch list items. These required cap repairs do not affect the functionality of the remedy. The site will then move into the operation and maintenance (O&M) phase.

IV. SCHEDULE OF ACTIVITES FOR SITE COMPLETION

The following post-construction activities will be completed according to the schedule below:

Activity	Estimated Completion Date	Responsible Organization
EPA Approval of Final O&M Plan	January 31, 2013	EPA
Completion of Punch List Items	April 30, 2013	RP Group
EPA Approval of RA Construction Completion Report	April 30, 2013	EPA
Implementation of Environmental Restrictive Covenants	December 31, 2013	RP Group
Completion of First Statutory Five-Year Review Report	August 22, 2016	EPA

Richard C. Karl, Director
Superfund Division
U.S. Environmental Protection Agency

1/31/2013
Date